

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Lisa Francis	:	Chapter 13
	:	Case No. 20-12746-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY TOYOTA LEASE TRUST

Debtor, Lisa Francis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Toyota Lease Trust and hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. The information listed does not reference the debtor's vehicle.
7. Admitted.
8. Denied. Debtor avers all payments were made to date.
9. Admitted.
10. Debtor unsure of the same.
11. No objection to terms.
12. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: July 14, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Keri P. Ebeck, Esq.
Attorney for Movant *Toyota Lease Trust*
Electronic Notice to kebeck@bernsteinlaw.com

Dated: July 14, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
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